

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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TZVI WEISS, <i>et. al.</i> ,	:	
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Plaintiffs,	:	CV 05-4622 (CPS) (KAM)
	:	
-against-	:	
	:	
NATIONAL WESTMINSTER BANK, PLC,	:	<u>ANSWER AND</u>
	:	<u>AFFIRMATIVE DEFENSES</u>
Defendant.	:	
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Defendant National Westminster Bank Plc (“NatWest”) by its counsel, Cleary Gottlieb Steen & Hamilton LLP, as and for its Answer and Affirmative Defenses to the Sixth Amended Complaint (the “Complaint”), states as follows:

NATURE OF ACTION

1. Denies the allegations contained in paragraph 1 of the Complaint to the extent they involve matters of fact relating to NatWest, denies knowledge or information sufficient to form a belief as to the truth of such allegations as they pertain to other persons, and states that the balance of paragraph 1 consists of conclusions of law to which no responsive pleading is necessary, except admits that NatWest is a financial institution headquartered in the United Kingdom.

JURISDICTION AND VENUE

2. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 2 of the Complaint, except admits that plaintiffs purport to base jurisdiction on the statutory provisions cited therein.

3. States that paragraph 3 of the Complaint consists of a legal conclusion as to which no responsive pleading is necessary.

4. Denies the allegations contained in paragraph 4 of the Complaint.

THE PARTIES

5. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 5 of the Complaint.

6. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 6 of the Complaint.

7. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 7 of the Complaint to the extent they refer to matters of fact, and states that the balance of paragraph 7 consists of conclusions of law to which no responsive pleading is necessary.

8. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 8 of the Complaint.

9. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 9 of the Complaint.

10. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 10 of the Complaint.

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550. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 550 of the Complaint.

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552. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 552 of the Complaint.

553. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 553 of the Complaint.

554. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 554 of the Complaint.

555. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 555 of the Complaint.

556. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 556 of the Complaint.

557. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 557 of the Complaint.

558. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 558 of the Complaint.

559. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 559 of the Complaint.

560. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 560 of the Complaint.

561. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 561 of the Complaint.

562. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 562 of the Complaint.

563. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 563 of the Complaint.

564. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 564 of the Complaint.

565. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 565 of the Complaint.

566. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 566 of the Complaint.

567. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 567 of the Complaint.

568. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 568 of the Complaint.

569. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 569 of the Complaint.

570. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 570 of the Complaint.

571. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 571 of the Complaint.

572. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 572 of the Complaint.

573. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 573 of the Complaint.

574. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 574 of the Complaint.

575. Denies the allegations contained in paragraph 575 of the Complaint, except admits that NatWest is a British financial institution with its principal place of business in London, United Kingdom, and avers that NatWest is a wholly-owned subsidiary of the Royal Bank of Scotland Group.

576. Denies the allegations contained in paragraph 576 of the Complaint.

577. Denies the allegations contained in paragraph 577 of the Complaint, except admits that NatWest was registered to conduct business within the State of Texas, avers that NatWest closed its Texas office on September 15, 2003, and refers the Court to the Texas state records for a true and accurate statement of their contents.

FACTUAL ALLEGATIONS

578. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 578 of the Complaint.

579. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 579 of the Complaint.

580. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 580 of the Complaint.

581. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 581 of the Complaint.

582. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 582 of the Complaint.

583. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 583 of the Complaint.

584. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 584 of the Complaint.

585. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 585 of the Complaint.

586. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 586 of the Complaint, to the extent they refer to matters of fact, and states that the balance of paragraph 586 consists of conclusions of law to which no responsive pleading is necessary.

587. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 587 of the Complaint.

588. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 588 of the Complaint.

589. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 589 of the Complaint.

590. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 590 of the Complaint.

591. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 591 of the Complaint.

592. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 592 of the Complaint.

593. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 593 of the Complaint.

594. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 594 of the Complaint.

595. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 595 of the Complaint.

596. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 596 of the Complaint.

597. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 597 of the Complaint, to the extent they refer to matters of fact, and states that the balance of paragraph 597 consists of conclusions of law to which no responsive pleading is necessary.

598. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 598 of the Complaint, except denies that Interpal maintains several accounts at NatWest.

599. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 599 of the Complaint.

600. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 600 of the Complaint.

601. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 601 of the Complaint.

602. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 602 of the Complaint, except admits, upon information and belief, that the U.S. government designated Interpal a Specially Designated Global Terrorist (“SDGT”) on or around August 22, 2003.

603. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 603 of the Complaint, except admits, upon information and belief, that the U.S. government designated Interpal an SDGT on or around August 22, 2003.

604. Denies the allegations contained in paragraph 604 of the Complaint.

605. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 605 of the Complaint.

606. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 606 of the Complaint.

607. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 607 of the Complaint.

608. Denies the allegations contained in paragraph 608 of the Complaint concerning knowledge by NatWest of Yussuf al-Qaradawi's connections to terrorism and Interpal, and denies having knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

609. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 609 of the Complaint.

610. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 610 of the Complaint.

611. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 611 of the Complaint.

612. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 612 of the Complaint.

613. Denies the allegations contained in paragraph 613 of the Complaint to the extent they pertain to NatWest, and denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations in paragraph 613.

614. Denies the allegations contained in paragraph 614 of the Complaint to the extent they pertain to NatWest, and denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 614.

615. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 615 of the Complaint.

616. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 616 of the Complaint.

617. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 617 of the Complaint.

618. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 618 of the Complaint.

619. Denies the allegations contained in paragraph 619 of the Complaint to the extent they pertain to NatWest, and denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 619.

620. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 620 of the Complaint.

621. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 621 of the Complaint.

622. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 622 of the Complaint.

623. Denies the allegations contained in paragraph 623 of the Complaint.

624. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 624 of the Complaint.

625. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 625 of the Complaint.

626. Admits the allegations contained in paragraph 626 of the Complaint.

627. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 627 of the Complaint, except admits that Interpal had accounts at NatWest in 1996, avers that the U.K. Charity Commission froze Interpal's accounts at NatWest in March 1996, but ultimately released Interpal's assets from that freeze in April 1996, and refers to the Charities Act 1993 for a true and accurate description of the Commission's powers and functions.

628. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 628 of the Complaint.

629. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 629 of the Complaint, except admits that Interpal had accounts at NatWest in 1996, and avers that the U.K. Charity Commission froze Interpal's accounts at NatWest in March 1996, but ultimately released Interpal's assets from that freeze in April 1996.

630. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 630 of the Complaint, except admits that Interpal had accounts at NatWest in 1996, avers that the U.K. Charity Commission froze Interpal's accounts at NatWest in March 1996, but ultimately released Interpal's assets from that freeze in April

1996, and refers to the Charity Commission's May 30, 1996 report for a true and accurate statement of the Commission's findings.

631. In response to paragraph 631 of the Complaint, refers to the Charity Commission's May 30, 1996 report for a true and accurate statement of its contents.

632. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 632 of the Complaint, and refers to the Charity Commission's May 30, 1996 report for a true and accurate statement of its contents.

633. States that paragraph 633 of the Complaint consists of conclusions of law to which no responsive pleading is necessary.

634. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 634 of the Complaint to the extent they involve matters of fact, and states that the balance of paragraph 634 consists of conclusions of law to which no responsive pleading is necessary.

635. Denies the allegations contained in paragraph 635 of the Complaint to the extent they involve matters of fact that pertain to NatWest, denies knowledge or information sufficient to form a belief as to such allegations as they pertain to any other person, and states that to the extent paragraph 635 involves conclusions of law, no responsive pleading is necessary.

636. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 636 of the Complaint, except admits that Interpal had accounts at NatWest, and avers that the U.K. Charity Commission froze Interpal's accounts at NatWest in March 1996, but ultimately released Interpal's assets from that freeze in April 1996.

637. Denies the allegations contained in paragraph 637 of the Complaint.

638. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 638 of the Complaint.

639. Denies the allegations contained in paragraph 639 of the Complaint.

640. Denies the allegations contained in paragraph 640 of the Complaint to the extent they pertain to NatWest, and denies knowledge or information sufficient to form a belief as to the truth of such allegations as they pertain to any other person.

641. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 641 of the Complaint.

642. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 642 of the Complaint.

643. Denies the allegations contained in paragraph 643 of the Complaint, except admits that on August 16, 2002, and pursuant to instructions received from Interpal, NatWest effected the transfer of \$1,906.00 from an account owned by Interpal to the Orphan Care Society.

644. Denies the allegations contained in paragraph 644 of the Complaint, except admits that on September 17, 2002, and pursuant to instructions received from Interpal, NatWest effected the transfer of £6,547.00 from an account owned by Interpal to the Orphan Care Society.

645. Denies the allegations contained in paragraph 645 of the Complaint, except admits that on November 15, 2002, and pursuant to instructions received from Interpal, NatWest effected the transfer of £5,707.00 from an account owned by Interpal to the Orphan Care Society.

646. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 646 of the Complaint.

647. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 647 of the Complaint.

648. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 648 of the Complaint.

649. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 649 of the Complaint.

650. Denies the allegations contained in paragraph 650 of the Complaint, except admits that on May 2, 2003, and pursuant to instructions received from Interpal, NatWest effected the transfer of £15,713.00 from an account owned by Interpal to the Jenin Zakat Committee.

651. Denies the allegations contained in paragraph 651 of the Complaint, except admits that on July 11, 2003, and pursuant to instructions received from Interpal, NatWest effected the transfer of £15,330.00 from an account owned by Interpal to the Jenin Zakat Committee.

652. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 652 of the Complaint.

653. States that paragraph 653 of the Complaint purports to reference organizations listed in paragraph 352 of the Complaint, but as no list of organizations appears in paragraph 352, no responsive pleading is necessary.

654. Denies the allegations contained in paragraph 654 of the Complaint.

655. Denies the allegations contained in paragraph 655 of the Complaint, and denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in the footnote thereto, except admits that on April 12, 2000, and pursuant to instructions received from Interpal, NatWest accepted payments totaling \$66,000.00 from “Holyland Foundation General.”

656. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 656 of the Complaint.

657. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 657 of the Complaint to the extent they involve matters of fact, and states that to the extent they consist of conclusions of law, no responsive pleading is necessary.

658. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 658 of the Complaint.

659. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 659 of the Complaint to the extent they involve matters of fact, except admits, upon information and belief, that the Council of the European Union designated the Holy Land Foundation as a terrorist organization in December 2001, and states that to the extent these allegations consist of conclusions of law, no responsive pleading is necessary.

660. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 660 of the Complaint to the extent they involve matters of fact, except admits, upon information and belief, that HAMAS and the Holy Land Foundation were named on the European Union's list of entities subject to financial sanctions, and states that to the extent these allegations consist of conclusions of law, no responsive pleading is necessary.

661. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 661 of the Complaint.

662. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 662 of the Complaint to the extent they involve matters

of fact, and states that to the extent they consist of conclusions of law, no responsive pleading is necessary.

663. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 663 of the Complaint to the extent they involve matters of fact, and states that to the extent they consist of conclusions of law, no responsive pleading is necessary.

664. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 664 of the Complaint.

665. Denies the allegations contained in paragraph 665 of the Complaint, except admits that on March 27, 2003, and pursuant to instructions received from Interpal, NatWest accepted payments totaling 295,000 Euros from Stichting Al-Aqsa, and denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in the footnote thereto.

666. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 666 of the Complaint to the extent they involve matters of fact, and states that to the extent they consist of conclusions of law, no responsive pleading is necessary.

667. Denies the allegations contained in paragraph 667 of the Complaint.

668. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 668 of the Complaint.

669. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 669 of the Complaint.

670. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 670 of the Complaint.

671. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 671 of the Complaint.

672. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 672 of the Complaint.

673. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 673 of the Complaint.

674. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 674 of the Complaint to the extent they refer to matters of fact, except admits, upon information and belief, that the U.S. government designated Interpal an SDGT on or around August 22, 2003, and states that the balance of paragraph 674 consists of conclusions of law to which no responsive pleading is necessary.

675. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 675 of the Complaint.

676. Denies the allegations contained in paragraph 676 of the Complaint.

677. Denies the allegations contained in paragraph 677 of the Complaint as they pertain to NatWest, and denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

678. Denies the allegations contained in paragraph 678 of the Complaint.

679. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 679 of the Complaint.

680. Denies the allegations contained in paragraph 680 of the Complaint.

681. Denies the allegations contained in paragraph 681 of the Complaint and avers that at various times, Interpal had accounts numbered 140-00-04156838, 60720508524882 and 60082295142940 at NatWest.

682. Denies the allegations contained in paragraph 682 of the Complaint.

683. Denies the allegations contained in paragraph 683 of the Complaint.

684. Denies the allegations contained in paragraph 684 of the Complaint.

685. Denies the allegations contained in paragraph 685 of the Complaint.

686. Denies the allegations contained in paragraph 686 of the Complaint.

687. Denies the allegations contained in paragraph 687 of the Complaint.

688. Denies the allegations contained in paragraph 688 of the Complaint relating to the transfer by Interpal, except admits that on February 19, 2003, and pursuant to instructions received from Interpal, NatWest effected the transfer of £21,424.00 from an account owned by Interpal to the Tulkarem Zakat Committee, and denies knowledge or information sufficient to form a belief as to the truth of the balance of allegations contained in paragraph 688 of the Complaint, including the authenticity of Exhibit A.

689. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 689 of the Complaint, to the extent they refer to matters of fact, and states that the balance of paragraph 689 consists of conclusions of law to which no responsive pleading is necessary.

690. Denies the allegations contained in paragraph 690 of the Complaint, except admits that on April 1, 2003, and pursuant to instructions received from Interpal, NatWest effected the transfer of £18,000.00 from an account owned by Interpal to the Tulkarem Zakat Committee.

691. Denies the allegations contained in paragraph 691 of the Complaint relating to the transfer by Interpal, except admits that on July 30, 2003, and pursuant to instructions received from Interpal, NatWest effected the transfer of £73,757.00 from Interpal's account numbered 60082295142940 to the Jenin Zakat Committee, and denies knowledge or information sufficient to form a belief as to the truth of the balance of allegations contained in paragraph 691 of the Complaint, including the authenticity of Exhibit B.

692. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 692 of the Complaint.

693. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 693 of the Complaint, to the extent they refer to matters of fact, and states that the balance of paragraph 693 consists of conclusions of law to which no responsive pleading is necessary.

694. Denies the allegations contained in paragraph 694 of the Complaint.

695. Denies the allegations contained in paragraph 695 of the Complaint relating to the transfer by Interpal, except admits that on November 5, 2003, and pursuant to instructions received from Interpal, NatWest effected the transfer of £32,329.00 from Interpal's account numbered 60082295142940 to the Jenin Zakat Committee, and denies knowledge or information sufficient to form a belief as to the truth of the balance of allegations contained in paragraph 695 of the Complaint, including the authenticity of Exhibit C.

696. States that paragraph 696 of the Complaint, which is a sentence fragment, consists of conclusions of law to which no responsive pleading is necessary.

697. States that paragraph 697 of the Complaint, which is a sentence fragment, consists of conclusions of law to which no responsive pleading is necessary.

698. Denies that the Financial Action Task Force defines and enforces legal norms, and states that the balance of paragraph 698 of the Complaint consists of conclusions of law to which no responsive pleading is necessary.

699. Upon information and belief, admits the allegations contained in paragraph 699 of the Complaint.

700. States that paragraph 700 of the Complaint consists of conclusions of law to which no responsive pleading is necessary.

701. States that paragraph 701 of the Complaint consists of conclusions of law to which no responsive pleading is necessary.

702. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 702 of the Complaint.

703. States that paragraph 703 of the Complaint consists of conclusions of law to which no responsive pleading is necessary.

704. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 704 of the Complaint, except, upon information and belief, admits that the FATF issued a report in April 2002, and refers to that report for a true and accurate statement of its contents.

705. To the extent that paragraph 705 of the Complaint quotes from the FATF report, refers to such report for a true and accurate statement of its contents, and states that paragraph 705 otherwise consists of conclusions of law to which no responsive pleading is necessary.

706. States that paragraph 706 of the Complaint consists of conclusions of law to which no responsive pleading is necessary.

707. Denies the allegations contained in paragraph 707 of the Complaint.

708. Denies the allegations contained in paragraph 708 of the Complaint, and refers to the July 16, 2002 press release by six U.K. banks, including Royal Bank of Scotland, for a true and accurate statement of its contents.

709. Denies the allegations contained in paragraph 709, avers that six U.K. banks, including Royal Bank of Scotland, issued a “Statement of Principles” on July 16, 2002, and refers to such Statement for a true and accurate statement of its contents.

710. Denies the allegations contained in paragraph 710 to the extent they purport to involve matters of fact, and states that to the extent paragraph 710 of the Complaint consists of conclusions of law, no responsive pleading is necessary.

711. States that paragraph 711 of the Complaint consists of conclusions of law to which no responsive pleading is necessary.

712. States that paragraph 712 of the Complaint consists of conclusions of law to which no responsive pleading is necessary.

713. Denies the allegations contained in paragraph 713 of the Complaint as they pertain to NatWest, and denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

714. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 714 of the Complaint.

FIRST CLAIM FOR RELIEF

715- 722. In response to paragraphs 715-722 of the Complaint, states that this claim has been dismissed, and that no responsive pleading to it is therefore required.

SECOND CLAIM FOR RELIEF

723. In response to paragraph 723 of the Complaint, reports and realleges paragraphs 1 through 723 hereof as if fully set forth herein.

724. Denies the allegations contained in paragraph 724 of the Complaint.

725. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 725 of the Complaint.

726. Denies the allegations contained in paragraph 726 of the Complaint.

727. Denies the allegations contained in paragraph 727 of the Complaint.

728. Denies the allegations contained in paragraph 728 of the Complaint.

729. Denies the allegations contained in paragraph 729 of the Complaint.

THIRD CLAIM FOR RELIEF

730. In response to paragraph 730 of the Complaint, reports and realleges paragraphs 1 through 730 hereof as if fully set forth herein.

731. Denies the allegations contained in paragraph 731 of the Complaint.

732. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 732 of the Complaint.

733. Denies the allegations contained in paragraph 733 of the Complaint.

AFFIRMATIVE DEFENSES

First Affirmative Defense

734. The Complaint fails to state a claim upon which relief can be granted.

Second Affirmative Defense

735. Plaintiffs' claims are barred, in whole or in part, by the intervening acts, wrongs, omissions and/or negligence of other individuals or entities.

Third Affirmative Defense

736. Plaintiffs' claims are barred, in whole or in part, by plaintiffs' lack of standing to raise these claims.

Fourth Affirmative Defense

737. To the extent that plaintiffs have suffered damages, any such damages were not caused by any conduct of NatWest, but resulted in whole or in part from the conduct of plaintiffs and/or persons other than NatWest.

Fifth Affirmative Defense

738. There is no legal basis for Plaintiffs' requested relief of a declaratory order.

Sixth Affirmative Defense

739. To the extent that plaintiffs have already recovered or will from other persons for the injuries alleged by them, they are barred from seeking duplicative recovery from NatWest.

Seventh Affirmative Defense

740. This Court lacks personal jurisdiction over NatWest.

Additional Affirmative Defenses

741. NatWest hereby gives notice that it intends to rely upon any other defense or defenses that may become available or appear during pretrial proceedings in this case and hereby reserves the right to amend this Answer and Affirmative Defenses to the Sixth Amended Complaint to plead and assert any such additional affirmative defenses as they become known and appropriate during the course of litigation.

Dated: New York, New York
July 1, 2016

CLEARY GOTTlieb STEEN & HAMILTON LLP

By: 
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